



MSM MILLING

Statement of Environmental Effects

SITE EXPANSION AT DEDERANG STREET, MANILDRA

17 May 2024

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1. INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared to support a Development Application (DA) for the expansion of the existing MSM Milling oil seed processing operation at Dederang Street, Manildra, including the installation of a hexane solvent extraction plant.

The land the subject of the application includes Lot 1 DP1085601, Lots 250 and 251 DP750155 and Part Lot 242 DP750155 (refer to **Table 1**), also referred to as Lot 12 DP 1305255 in an unregistered plan of subdivision created by DA2024/0049.

The proposed development application follows the three previously approved and lodged development applications involving rail silos (DA2024/0060, approved 25 January 2024), demolition and boundary adjustments (DA2024/0049, approved 11/12/2023), and the addition of office buildings, a meal building, canola storage tanks and associated infrastructure (DA2024/0090, pending decision).

The proposal relates to expansion of the existing agricultural processing industry, known as MSM Milling.

This SEE has the following format.

- **Section 2** of this report provides a description of the subject site and its locality.
- **Section 3** outlines the proposed development.
- **Section 4** details the planning framework applicable to the subject site and proposed development.
- **Section 5** identifies the impacts of the proposed development.
- **Section 6** provides a conclusion to the SEE.

2. THE SITE & ITS LOCALITY

2.1 The Site

The subject site consists of a number of lots located to the south of Dederang Street, Manildra. Relevant lots associated with the application are outlined in **Table 1**.

Table 1 – Site details

Lot/DP	Ownership
Lot 1 DP1085601	MSM Milling
Lot 250 DP750155	MSM Milling
Lot 251 DP750155	Manildra Flour
Part Lot 242 DP750155	Manildra Flour

The site is located to the south of Dederang Street, which is parallel to the zoned rail corridor hosting the Orange – Broken Hill Railway Line.

To the north of the railway line is the urban area of the town of Manildra. Land to the east of the site is occupied by the Manildra Flour Mill, other industrial activities and vacant land. Land to the south is agricultural land in use for grazing and cropping. Land to the north-west is occupied by large lot residential. Two dwellings are currently located on Lots 242 and 251, however these have been recently approved to be demolished via CSC DA2024/0049. This application also involved a boundary adjustment to create a new land parcel that will

accommodate the proposed development. A subdivision is currently with CSC to proceed with this boundary adjustment.

The subject site/host lot is depicted in Figure 1.

2.2 The Locality

The site is located in the southern area of the town of Manildra, between the Orange – Broken Hill Railway Line and Mandagery Creek and to the west of the Manildra Flour Mill.

The site locality is depicted in Figure 2.

2.3 Existing development

The existing oil seed mill and packing plant on the southern side of Dederang St was granted Development Consent first issued by Cabonne Council in February 2004 (DA 2004/175). Milling at the site commenced in May 2007. The mill was initially approved with production of approximately 28,000 tonne per annum (tpa).

In November 2009 Council issued Development Consent (DA 2010/28) permitting an increase in processing to 110,000 tonne per annum, along with the establishment and operation of the packing plant. At this point, the mill became a scheduled premise pursuant to the *Protection of the Environment Operations Act 1997* and the Environment Protection Authority (EPA) became the Appropriate Regulatory Authority.

MSM Milling's activities are regulated by Environment Protection Licence (EPL 13228).

In August and November 2011 Cabonne Council issued Development Consent (DA 2011/166) permitting the construction of two new silos for the storage of meal.

In October 2012 Cabonne Council issued Development Consent (DA 2013/43) permitting the construction and operation of a feed mill, increasing total processing capacity at the site to 244,000 tpa.

In 2014, Cabonne Council issued Development Consent (DA 2014/92) for a steam boiler to provide process steam for milling operations. This consent was subsequently modified twice; once in 2015 to change the fuel source of the boiler to biomass, and again in 2019 to use surplus off-cut timber as a fuel source.

DA 2024/0049 has been recently approved by Cabonne Council to demolish the buildings and remove trees located on Lots 242 and 251 and complete a boundary adjustment. Lot 12 DP 1305255 created by this application will host the infrastructure the subject of this application.

DA 2024/0060 has been recently approved by Cabonne Council to install three rail silos on land to the north of Dederang Street.

DA 2024/0090 is currently pending determination with Cabonne Council for the expansion of the existing oil seed processing operation including minor site grading, stormwater management, development of a meal storage building and offices, oil storage and other ancillary components. The applicant is currently pending determination with Cabonne Council.

Figure 1 - The Subject Site

MSM MILLING
STATEMENT OF ENVIRONMENTAL EFFECTS
SITE EXPANSION AT DEDERANG STREET, MANILDRA



Figure 2 - The Site Locality

MSM MILLING
STATEMENT OF ENVIRONMENTAL EFFECTS
SITE EXPANSION AT DEDERANG STREET, MANILDRA



3. THE DEVELOPMENT

3.1 Pre-lodgement community consultation

Early community consultation has been undertaken in relation to the proposed development in an effort to raise awareness and understanding of the project benefits, to improve the capacity of the community to engage with the project, to allow MSM Milling to gain a better understanding of community expectations and understand community options and preferences.

The community consultation process involved briefing Cabonne Council and Mayor, as well as holding community information sessions. The information sessions involved an open invitation to people within Manildra Cudal and Molong and allow for community members to 'have a chat', meet the team and ask any questions. Other consultation materials included a kitchen table conversation guide, a community newsletter, two fact sheets in relation to the plant expansion and the solvent extraction processing, and a frequently asked questions sheet. The feedback received from the community to date has been very positive.

3.2 Development description

The proposed development involves alterations to the existing approved operations of the site, including an increase to the processing capacity together with the construction of a new solvent extraction plant and a number of other elements. The new plant improves the canola oil extraction process on site to provide increased efficiency.

3.2.1 BACKGROUND

The catalyst for the changes proposed by this application have included a number of global and national trends that have resulted in an increased demand for canola oil and canola meal to satisfy human food needs, as well as an increased demand for vegetable oil as a feedstock for use in the biofuels and renewable diesel industries. This global diversion of large quantities of canola oil into the biofuels industry has opened up opportunities for the applicant to supply export food markets, principally in Asia, which were previously supplied by foreign firms now selling to the fuels industry.

Further, the improved oil yields generated by the solvent extraction process deliver the most value to the community and the broader economy for all the resources that are utilised in the entire canola production system and supply chain.

The proposal also entails an increased utilisation of the company's very successful biomass fired boiler. Combined with the proposed adoption of solar PV electricity generation, the overall energy demands of the expanded business will be supplied by approximately 62% renewables.

The proposed changes also provide for significantly improved operational processes, thereby assisting with the ongoing financial viability of the operation and its continued positive contribution to the local, regional and national economy.

3.2.2 PROCESSING CAPACITY

The site currently has approval to process up to 244,400 tonnes per annum of canola and feed mill products via DA Consent 2013/43. The proposed alterations to the existing facility will result in an increased total combined processing capacity across the site to 370,000 tonnes of canola and feed mill products, noting no change to feed mill product volumes.

Directly associated with the increased processing capacity is the change to internal operations and business strategy to increase canola seed receipts by rail and to export larger quantities of canola oil and meal via rail, together with an industry wide change to the size of delivery vehicles, from B-doubles to principally A-doubles. As a result of these changes, the overall increase in heavy traffic movements otherwise associated with the increased capacity is minor. The change in the road vehicle size also assists with reducing incoming and outgoing transport movements associated with the approved feed pellet mill.

Existing, proposed (but not approved) and approved operational product storage on site is sufficient to accommodate the increased capacity, as the proposed solvent plant will increase daily throughput such that the capacity for storage on hand does not need to significantly increase.

3.2.3 SOLVENT EXTRACTION PLANT

The construction of a Solvent Extraction Plant (SEP) is proposed to enable more efficient extraction of canola oil from the parent seed material, and it will also allow for an increased processing capacity on site, as discussed above.

The current MSM processing plant uses a more traditional method of mechanical pressing of the canola seed to extract the canola oil, and to produce canola meal for stockfeed. The proposed solvent extraction process involves using a solvent called hexane to remove the last remaining extractable oil from partially pressed canola seed "cake". This process is more energy efficient and cost effective than mechanical pressing as it maximises the amount of oil that is able to be extracted from each tonne of seed. Hexane is an industrial grade hydrocarbon solvent that is colourless and odourless at room temperature. It is very commonly used in the food and mining industries as well as a cleaning agent in printing, textiles, shoe making and furniture making. Solvent extraction technology is a very long established practice, with the first oilseed SEP in Australia commencing over 100 years ago. It allows for a second stage in the extraction process that provides for much higher energy efficiency and improved oil yields. The process involves bathing the canola meal in hexane which allows the hexane to penetrate the meal and maximise the volume of oil extracted. The process creates the two distinct products, oil and meal which initially also include a residual quantity of the solvent. These oil and meal fractions still containing some solvent are then "desolventised" utilising distillation and vapor stripping techniques. The extraction and desolventising processes all occur in the proposed SEP building.

The solvent plant is to be located between the existing plant and the currently proposed office buildings. The siting of the SEP is dictated by the 2021 Version of NFPA 36 *Standard for Solvent Extraction Plants*, which prescribes required setback and clearances. The SEP will be sited 30m from the southern boundary of Dederang Street and approximately 85m west of the current processing building. It will be surrounded by a 15m restricted area that is free of any other plant or equipment, apart from essential supporting infrastructure, such as infeed and out feed conveyors, solvent storage tanks and water tanks. The restricted area will be bounded by a 1.2m high concrete vapour barrier.

The plant structure comprises a six storey building with an overall ridge height of 26.75 metres, a proposed overall length of 38.68 metres and a width of 26.63 metres, including external access towers. The plant is proposed to be enclosed on the northern, eastern and western facades from a height of approximately 3 metres above ground level with Windspray Colorbond steel cladding, to match the existing process buildings. The southern side and lower areas will not be sheeted but will be enclosed by a suitable bird netting. The open lower area and open southern side of the building is to provide good natural ventilation of the process areas.

Mechanically processed meal (also referred to as cake) will be transported from the current plant by a series of enclosed chain conveyors mounted in a roofed gantry structure, approximately 85 metres long, 2 metres wide and 2 metres high to the proposed SEP. Once the cake has been "washed" with hexane to remove the inherent canola oil, the resulting desolventised oil fraction will be pumped to either the existing or (separately) proposed

canola oil storage tanks. From these storage tanks, the oil will then be transferred to the refinery operation in the existing main process building for further refinement, as is the case with the current operations. Processed and desolventised meal from the SEP will be hammermilled and moisture corrected prior to being conveyed to storage in the (separately) proposed meal storage building. Processed meal will then continue to be transported off site for sale to third parties consistent with the current operational arrangements.

The entire plant is proposed to be operational 24 hours per day, consistent with the existing approved hours of operation for the site.

3.2.4 NEW BIOFILTER SYSTEM

The proposed biofilter will be located within the biomass bunker that was dealt with in the previous development application. The bunker is located in a central location on the site, between the existing receive building, the proposed hexane storage tanks and the two gantries. All the process air streams generated by the SEP will be captured, humidified in a new scrubber unit located in the SEP building, and treated by the new biofilter, as part of a fully integrated Odour Control System. (OCS)

The proposed biofilter design consists of a two-cell, single-sided configuration with an active bed area of approximately 244m² and a total wall height of 2.4m. Since two cells will be used in the system, each will be capable of being isolated for maintenance or medium replacement. This biofilter will be in addition to the existing biofilter (three-cell, single-sided configuration with a bed area of approximately 300m² and a total wall height of 2.4m) currently in use on site. The existing biofilter will continue to treat the process air streams from the current plant which, as part of the proposed expansion, will be slightly reconfigured. This re-configuration will actually reduce the load on the existing biofilter.

3.2.5 ANCILLARY INFRASTRUCTURE

The proposed development also includes the construction of several ancillary structures on the site which include a small chiller plant, meal grinding and mixing building, a process water cooling system, hexane storage tanks, a vapour barrier wall, and a gantry containing a conveyor and maintenance walkway.

The chiller plant will be 2.5 metres by 5 metres and shall be located between the proposed administrative office buildings and the SEP. The chiller plant is used for cooling to low temperatures relatively small quantities of process water for the SEP.

The meal grinding and mixing building will adjoin the meal storage building and will be used to process canola meal generated by the SEP. The building is to be 1068 metres by 13.84 metres with an overall height of 18 metres. The building will be used to grind the meal as well as to make stockfeed pellets to be sold to market.

The process water cooling system is to be located adjacent to the canola oil tanks and the meal storage building and will have a foot print of approx. 24 metres by 12.5 metres. A series of 6 closed circuit air cooled condenser style units with automated adiabatic spray nozzles will comprise the system which will be utilised to cool to moderate temperatures the larger volumes of process water required by the SEP. A schematic view of one of the units is attached as **Appendix G**. This style of water cooling system, although significantly more expensive to purchase and run, reduces water consumption by at least 90% when compared to conventional evaporative style Cooling Towers. MSM believes that the extra expense is justified to minimise use of an increasingly scarce and precious resource.

3.2.6 ALTERATIONS TO EXISTING ON-SITE OPERATIONS

With the construction of the solvent plant on the site, changes to the existing operations of the site are necessary. The solvent plant will improve the extraction process of the canola mill and increase the processing capacity on site.

The proposed new operations will involve the following steps:

1. Canola seed typically arriving by road or rail and stored in approved rail silos or existing silos prior to processing.
2. Mechanical processing will continue to occur within the existing plant, albeit slightly re-configured.
3. Partly processed meal (cake) will be transported via conveyor to the new solvent plant for extraction.

4. Meal will be treated with solvent, resulting in two by-products, oil and meal, as discussed above.
5. Oil produced will be transferred to the existing or (separately) proposed oil storage tanks prior to further refinement and transport off-site.
6. Meal produced will be transferred to the new (separately) proposed meal storage building prior to transport off-site.

The increase in capacity, in conjunction with the construction of the previously approved rail silos and the separately proposed offices, meal storage building, weighbridge, transformer, boiler and oil storage, will result in minor changes to the existing arrangements for transport to and from the site. The improved arrangement provides for the one-way travel of heavy vehicles and the use of separate weighbridges to improve process efficiencies on site. The newly approved rail silos, together with the existing gantry, provides for significantly improved capacity to transport products to and from the site via rail. This is anticipated to reduce the required number of road vehicle trips to and from the site, despite the increase in the volume processed. This is discussed in more detail in **Section 5.2** with regard to the Traffic Impact Assessment (TIA) provided in **Appendix B**.

3.2.7 WASTEWATER MANAGEMENT

Changes will also be necessary regarding the generation of wastewater and its re-use. The wastewater generated onsite is expected to increase relative to the existing volumes produced. Current licencing allows for the management of the approximately 17 tonnes of wastewater produced per day to be used for dust suppression measures on site during dry months and off-site application as required.

It is anticipated that wastewater levels are likely to increase to approximately 78 tonnes per day. To manage this increased level of wastewater, it is proposed to both continue to utilise the treated water for the purposes of dust suppression on site, together with entering into arrangements with local licensed contractors to utilise this wastewater as a soil improvement agent utilising a soil injection process regulated by the EPA, as discussed below. The treated wastewater would be temporarily stored on site before being either used on site for dust suppression or transported offsite for use as a soil improvement agent. **Figure 3** demonstrates the water mass balance for the site.

Advice received from JRSR in **Appendix C** states that while it is anticipated that trace amounts of hexane may remain in the wastewater, it is noted that hexane has a low toxicity, is readily metabolised by microbes, has a high vapour pressure at 25 degrees Celsius, and is not a greenhouse gas. What this translates to for potential land application is that any trace amounts of hexane that end up in the wastewater stream will either be released to the atmosphere and break down through natural processes or be used by soil microbes as a source of carbon and energy.

The wastewater satisfies the requirements of the EPA Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the *Protection of the Environment Operations (Waste) Regulation 2014*. The exemption acts to exempt a consumer of liquid food waste from certain requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the Waste Regulation in relation to the application of that waste to land, provided the consumer complies with the conditions of the exemption.

The JRSR advice in **Appendix C** advises that, in addition to existing conditions of the EPA exemption, additional mitigation measures should be implemented on site. These recommendations include the following:

- Routine sampling of the wastewater stream. This will allow the land application rates to be adjusted should any variation in the BOD, COD and hexane amounts be detected. This may also be useful from a process monitoring perspective to potentially identify any issues with the operation of the facility as a whole.

- Routine monitoring of the application sites to track soil carbon levels and ensure no accumulation of hexane or its metabolites are occurring in soils that the wastewater is being applied to.
- Appropriate infrastructure and management systems to isolate any larger spills/leaks of hexane before entering the wastewater system.
- The venting of any wastewater holding tanks is used to ensure that hexane vapours cannot accumulate over time to produce potentially explosive concentrations.
- The capacity to store at least three full days of wastewater production at the MSM Milling site (ideally in three separate tanks) to provide flexibility in responding to contingency situations.
- The preparation of contingency plans to enable the response to situations like unexpected high concentrations of hexane in the wastewater, wastewater management after a significant leak/spill, and unavailability of the application site due to weather or mechanical breakdown.

As the use of the liquid waste is for the purposes of a soil amendment ancillary to the carrying out of agricultural operations, it does not require specific development consent. This topic is nonetheless discussed via this report to provide Council with sufficient information to be confident that wastewater associated with the project would be appropriately managed.

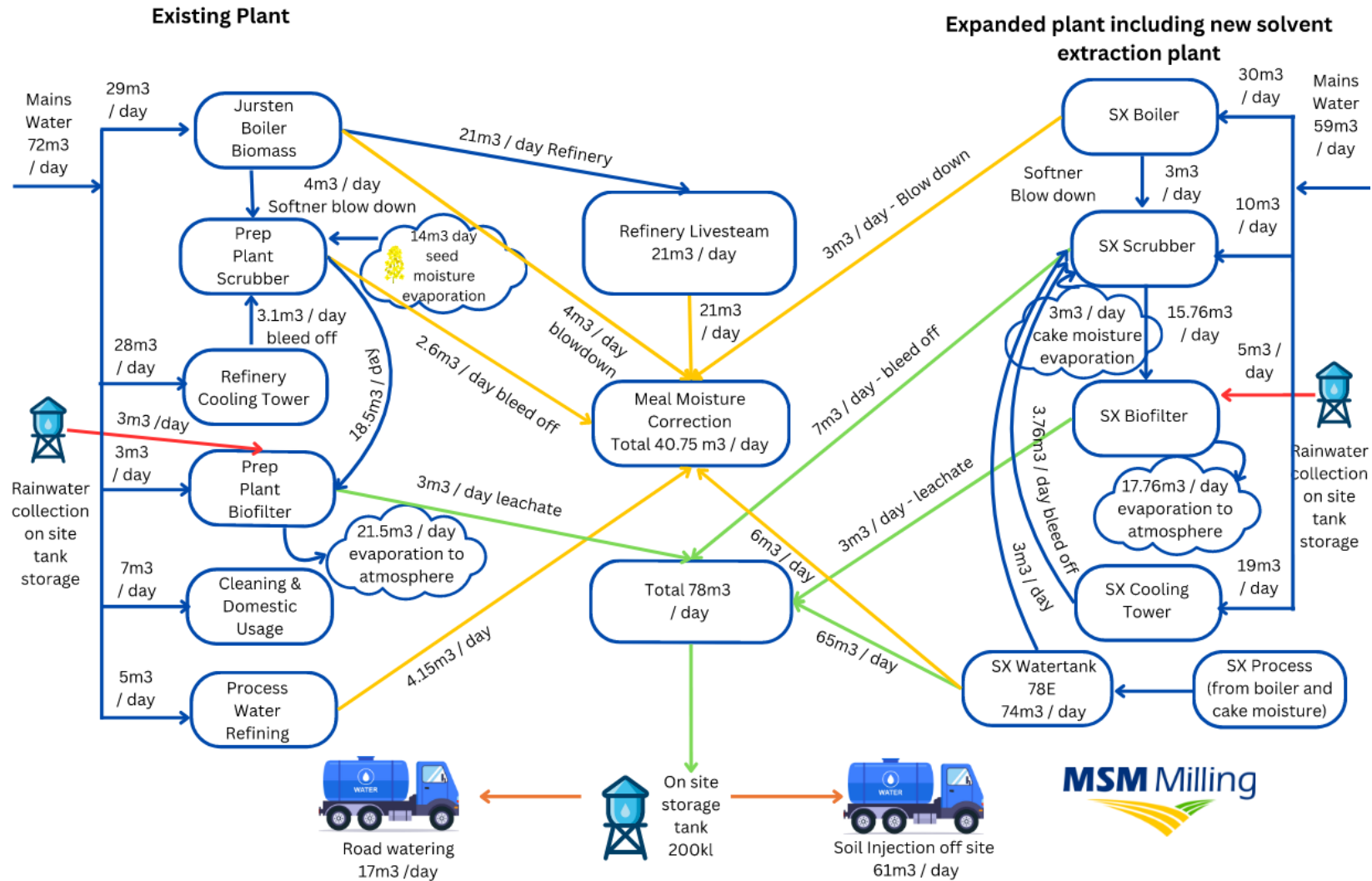
Sufficient storage is currently provided on site to provide at least three full days of storage under standard operating conditions. Truck movements associated with the off-site transfer of wastewater have been factored into the assessment.

3.2.8 SEQUENCE AND TIMING

The proposed works provide for improvements to the operation of the site, making it more efficient and cost effective for the whole MSM Milling business. With consideration of the other works approved, or under assessment, in earlier development applications, the applicant has planned for the construction of the solvent extraction plant to commence following the completion of the office buildings, canola oil storage tanks, and the meal storage building, which is expected to occur in mid to late 2024. It is expected that the construction of the solvent extraction plant will take around 9-12 months.

It is possible that different components would be delivered via separate construction certificates to account for material and contractor availability.

Figure 3 – MSM Milling Water Mass Balance
MSM Milling Water Mass Balance



4. STATUTORY PLANNING FRAMEWORK

4.1 Object of the EP&A Act

In New South Wales (NSW), the relevant planning legislation is the *Environmental Planning and Assessment Act 1979* (EP&A Act). The EP&A Act instituted a system of environmental planning and assessment in NSW and is administered by the Department of Planning & Environment (DPE). The objects of the EP&A Act are:

- (a) *To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
- (b) *To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
- (c) *To promote the orderly and economic use and development of land,*
- (d) *To promote the delivery and maintenance of affordable housing,*
- (e) *To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,*
- (f) *To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),*
- (g) *To promote good design and amenity of the built environment,*
- (h) *To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,*
- (i) *To promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,*
- (j) *To provide increased opportunity for community participation in environmental planning and assessment.*

The proposed development is not considered to be antipathetic to the above objects, and particularly aligns with aim (c). The proposed development is expected to significantly improve the efficiency of on-site processing capabilities and increase processing capacity. These works allow for the site to be used in an orderly and economical manner, by improving output and increasing employment opportunities on site.

4.2 Section 1.7

Section 1.7 of the EP&A Act requires consideration of Part 7 of the *Biodiversity Conservation Act 2016* (BC Act). Part 7 of the BC Act relates to an obligation to determine whether a proposal is likely to significantly affect threatened species. Under Section 7.2 of the BC Act, a development is considered to result in a significant impact in the following assessed circumstances.

Table 2 – Section 7.2 of the BC Act

Test	Assessment
1. it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or	The proposed works are located within a site that has been approved for clearing and is zoned for industrial purposes. This application does not require nor seek approval for any additional clearing of vegetation. The project is therefore unlikely to significantly affect threatened species or ecological communities, or their habitats.
2. the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or	All vegetation on site was recently approved for removal under DA 2024/0049, therefore no further clearing is required under this application. As such, the development will not exceed the biodiversity clearing threshold.
3. it is carried out in a declared area of outstanding biodiversity value.	The project site is not located within a declared area of outstanding biodiversity value

Source: Biodiversity Conservation Act 2016

4.3 Subordinate Legislation

The EP&A Act facilitates the preparation of subordinate legislation, consisting of:

- Environmental Planning Instruments (EPIs) (including State Environmental Planning Policies (SEPP), Local Environmental Plans (LEP), and deemed EPIs; and
- Development Control Plans (DCP).

In relation to the proposed development, the relevant subordinate legislation includes:

- *Cabonne Local Environmental Plan 2012;*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021; and*
- *State Environmental Planning Policy (Resilience and Hazards) 2021;*

The requirements of these are discussed in **Section 4.5** of this Statement.

4.4 Integrated Development

Section 4.46 of the EP&A Act states that development requiring consent and another activity approval is defined as Integrated Development. The proposed development is not classified as Integrated Development as it does not require approval under any of the legislation specified in Section 4.46.

Specifically, it does not require approval under the *Protection of the Environment Operations Act 1997* (the POEO Act) as the existing operations have an existing licence and do not require a new licence. The proposed development is expected to improve operational efficiencies and storage, as well as result in an increase in processing capacity of the existing agricultural produce industry (MSM Milling). Therefore, the proposal is expected to trigger the requirement of a variation to the current licence. A licence variation is not a trigger for the integrated provisions of the EP&A Act.

4.5 Designated development

Section 4.10 of the EP&A Act prescribes that certain development is designated development and an Environmental Impact Statement is required. The triggers for this are outlined in Schedule 3 of the EP&A Regs.

The site is an existing agricultural processing industry, as outlined in **Section 2.3**.

Part 3 of Schedule 3 of the EP&A Regs provides exceptions to designated development. Section 48 of Schedule 3 provides that additions and alterations to existing or approved development is not designated development, if, in the opinion of the consent authority, the additions or alterations do not significantly increase the environmental impacts of the existing or approved development.

In forming its opinion, the consent authority must give consideration to a range of matters, considered further in **Table 3**.

Table 3 – Alterations or additions to existing or approved development

Consideration	Assessment
(a) the impact of the existing development, including the following—	
(i) previous environmental management performance, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice,	The site has operated for many years, with the first development Consent (DA 2004/175) granted in February 2004. Several development applications and modifications have been granted since. The mill is compliant with the conditions of the consents and there are no known breaches. Similarly, the activities of the mill are regulated by EPL 13228, of which the mill is complaint and is not known to have been breached.
(ii) rehabilitation or restoration of any disturbed land,	The proposed alterations and additions involve development of urban land previously used for residential purposes. The proposed development is not anticipated to result in a direct or indirect impact that requires rehabilitation or restoration of any land.
(iii) the number and nature of all past changes and their cumulative effects,	There has been a total of eight development applications and two modifications since 2004 for the current operations. These consents generally related to changes to allow for improved efficiencies and capacity on site, with only two applications directly relating to an increase in production capacity. As demonstrated in the technical assessments submitted with the development application, the cumulative effects of the mill are with acceptable limits.
(b) the likely impact of the proposed alterations or additions, including the following—	
(i) the scale, character or nature of the proposal in relation to the development,	While the proposed development will result in an increase in the scale of the site, this is not expected to alter the

Consideration	Assessment
	character or the nature of the development. The development will continue to operate as a mill and will continue to contribute to the industrial character of Manildra.
(ii) the existing vegetation, air, noise and water quality, scenic character and special features of the land on which the development is, or will be, carried out and the surrounding locality,	As demonstrated in the technical assessments submitted with the development application, the proposed development will have an acceptable impact with regard to: <ul style="list-style-type: none"> • Traffic; • Air quality; • Noise impact; and • Potential hazards. As vegetation on the site has been removed as a result of previous development applications, the development is not anticipated to result in adverse impacts to existing vegetation. Additionally, there are no anticipated impacts on water quality or scenic character. There are no other known special features within the site or the immediate vicinity.
(iii) the degree to which the potential environmental impacts can be predicted with adequate certainty,	As demonstrated in the technical assessments submitted with the development application, the proposed development will have an acceptable impact with regard to: <ul style="list-style-type: none"> • Traffic; • Air quality; • Potential hazards; and • Noise impact. The technical assessments for these matters have been undertaken in accordance with the relevant regulatory guidelines.
(iv) the capacity of the receiving environment to accommodate changes in environmental impacts,	As demonstrated in the technical assessments submitted with the development application, the proposed development will have an acceptable impact with regard to: <ul style="list-style-type: none"> • Traffic; • Air quality; • Potential hazards; and • Noise impact. It is therefore considered that the surrounding environment is sufficient to accommodate the minor impacts of the development.
(c) proposals to mitigate the environmental impacts and manage residual risk,	Relevant mitigation measures have been identified in each of the technical assessments where relevant.

Consideration	Assessment
(d) proposals to facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities.	Relevant mitigation measures have been identified in each of the technical assessments where relevant.

On the basis, and with consideration of the findings and mitigation measures recommended in the technical reports provided in the appendices, it is concluded that the additions and alterations proposed will not result in a significant increase in environmental impacts of the approved or existing development. As such, it is considered that the proposed development does not comprise designated development.

It is noted that early pre-lodgement discussions with Council staff confirmed the acceptability of this approach.

4.6 Planning Instruments

4.6.1 LOCAL ENVIRONMENTAL PLAN

4.6.1.1 Introduction

The *Cabonne Local Environmental Plan 2012 (the CLEP 2012)* is the applicable local planning instrument applying to the land.

The proposed development is not antipathetic to the aims of the plan and is specifically consistent with the aims (c)(i), (c)(ii) and (c)(v), namely:

(c) to facilitate and encourage sustainable growth and development that achieves the following—

(i) contributes to continued economic productivity, including agriculture, business, tourism, industry and other employment opportunities,

(ii) allows for the orderly growth of land uses while minimising conflict between land uses within the relevant zone and land uses within adjoining zones,

...

(v) protects, enhances and conserves agricultural land and the contributions that agriculture makes to the regional economy,

The proposed development is expected to support and enhance the ongoing processing capabilities and capacity of the existing canola mill. This is expected to positively contribute to the ongoing economic productivity of the agricultural industry within the regional economy. The proposed development involves an existing land use on the site and is not expected to impact on adjoining land uses, with predominantly agricultural and industrial land surrounding the site.

4.6.1.2 Mapping

A review mapping via the NSW Planning Portal identifies the following applicable mapped constraints:

Table 4 – Cabonne LEP 2012 Mapping

Constraint	Applicability	Section addressed
Land Application Map	Applies	N/A
Land Zoning Map	E5 Heavy Industrial	Section 4.6.1.3
Lot Size Map	N/A	N/A
Land Reservation Acquisition Map	N/A	N/A
Heritage Map	N/A	N/A
Flood Planning Land Map	N/A	N/A
Terrestrial Biodiversity Map	N/A	N/A
Groundwater Vulnerability Map	N/A	N/A
Drinking Water Catchment Map	N/A	N/A
Riparian Lands and Watercourses Map	N/A	N/A

The above matters, together with other relevant LEP clauses, are discussed in the following sections.

4.6.1.3 Land Use Zoning

The site is located within Zone E5 Heavy Industrial under clause 2.3 of the CLEP 2012. The current use of the site supports the approved MSM Milling facility, located to the south of Dederang Street.

The existing use of the MSM Milling facility is characterised as an agricultural produce industry, defined as follows in the CLEP 2012:

***Agricultural produce industry** means a building or place used for the handling, treating, processing or packing, for commercial purposes, of produce from agriculture (including dairy products, seeds, fruit, vegetables or other plant material), and includes wineries, flour mills, cotton seed oil plants, cotton gins, feed mills, cheese and butter factories, and juicing or canning plants, but does not include a livestock processing industry.*

Development for the purposes of agricultural produce industries, including works ancillary to the industry, is permitted with consent on the basis that the E5 Land Use Table permits all developments not expressly prohibited in Part 4 of the table. As agricultural produce industries are not prohibited, they are therefore permitted with consent.

The proposed expansion of the existing facility within the E5 zone is permissible with consent on the basis that the proposed structures are either an expansion of the existing land use or they are ordinarily incidental or ancillary to the approved existing agricultural produce industry.

4.6.1.4 Stormwater management

Subsection 6.2(2) provides that the clause applies to all land in residential and employment zones. Where the clause applies, subclause 6.2(3) requires CSC to be satisfied of the matters in subclause 6.2(3) before granting development consent.

The site is located within an employment zone. Accordingly, the proposed development is considered in the context of clause 6.2(3) in **Table 5**.

Table 5 – Stormwater matters

Matters to be Satisfied:		Comment:	
(a)	is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and	The proposed development involves the construction of new structures on the site, as well as associated earthworks. The site will have some remaining permeable surfaces; however it is anticipated that stormwater will be directed to a new stormwater channel (DA2024/0090) to the east of the proposed building works. The earthworks on site have been designed to include swales through the site to further direct excess stormwater to the proposed stormwater channel.	✓
(b)	includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and	The previous development application currently under assessment with Council involves two rainwater tanks which can be utilised as an alternative water supply.	N/A
(c)	avoids any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if that impact cannot be reasonably avoided, minimises and mitigates the impact.	The previous development application currently under assessment with Council involves a stormwater channel through the site, as well as swales to direct stormwater to the channel. Due to this, the development is not expected to adversely impact on adjoining properties, native bushland or receiving waters.	✓

4.6.1.5 Essential Services

Section 6.8 prevents CSC from granting development consent unless it is satisfied that services that are essential for the development (supply of water, electricity, disposal and management of sewage, stormwater drainage or on-site conservation and vehicular access) are available or that adequate arrangements have been made to make them available when required.

It is understood that the site has existing electricity, water, stormwater, and sewerage arrangements that are capable of accommodating the proposed development or can be extended to accommodate the development.

4.6.2 STATE ENVIRONMENTAL PLANNING POLICY

4.6.2.1 State Environmental Planning Policy (Resilience and Hazards) 2021

4.6.2.1.1 Chapter 3 – Hazardous and Offensive Development

Section 3.12 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (the Hazards SEPP) prevents CSC from granting development consent unless it has considered the following:

- (a) current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development, and*

(b) whether any public authority should be consulted concerning any environmental and land use safety requirements with which the development should comply, and

(c) in the case of development for the purpose of a potentially hazardous industry—a preliminary hazard analysis prepared by or on behalf of the applicant, and

(d) any feasible alternatives to the carrying out of the development and the reasons for choosing the development the subject of the application (including any feasible alternatives for the location of the development and the reasons for choosing the location the subject of the application), and

(e) any likely future use of the land surrounding the development.

The proposed development involves the use of a solvent known as hexane and as such a Preliminary Hazard Analysis has been prepared by GHD (**Appendix D**). The report considered whether the proposal may be potentially hazardous or offensive in accordance with the SEPP requirements and with reference to the *Hazardous and Offensive Development Application Guidelines - Applying SEPP 33*. The report outlines a summary of the Dangerous Goods (DGs) used on site during construction and operations, a risk screening of the DGs and a Level 2 PHA. The summary of the risk screening results found that the proposed development will exceed the thresholds within the Hazards SEPP requirements for DG storage and is therefore considered a 'medium hazardous industry', requiring a Level 2 PHA assessment to be undertaken. The PHA concludes that while consequences can extend beyond the site boundary, the MSM Milling can effectively manage the frequency and risk, subject to the recommendations outlined in the report.

This is further discussed in **Section 5.11**.

4.6.2.1.2 Chapter 4 – Remediation of Land

Subsection 4.6 (1) of the Hazards SEPP prevents CSC from granting development consent unless it has considered, among other things, whether the land is contaminated.

A search of the NSW EPA contaminated land record and list of NSW contaminated sites notified to EPA (current as of 8 May 2024) was undertaken for contaminated sites within Manildra on 14 May 2024. No recorded contaminated sites were identified in Manildra.

In the unlikely event that contaminated soils are present within the site, a remediation action plan may be implemented.

The proposed development is located in a central location on the site, and extends onto land historically used for residential purposes, therefore it is unlikely that the land on the proposed site is contaminated. With consideration of the known history of the site, it is considered that further investigation is not required.

The site has recently been the subject of a grant of development consent whereat the relevant provisions of the Hazards SEPP have been considered and the suitability of the site confirmed.

4.6.2.2 State Environmental Planning Policy (Transport and Infrastructure) 2021

Subsection 2.48 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (the Infrastructure SEPP) applies to development within 5m of an exposed overhead electricity powerline. The subject site has powerlines running along the northern and southern boundaries of the site; therefore, it is expected that a referral to Essential Energy will be required. Notwithstanding, the design of the development has taken account of the Essential Energy standard CEOM7097 – Overhead Design Manual, with all structures of the proposed development located at least approximately 15 metres from the adjoining overhead powerlines, well outside

of the required 3 metre clearance zone for overhead powerlines in road reserves. It is considered that the proposed structures on the site are sufficiently distanced from these overhead powerlines to mitigate any potential impacts on the safety and operation of the electricity network.

4.6.3 DEEMED ENVIRONMENTAL PLANNING INSTRUMENTS

There are no deemed environmental planning instruments applying to the site.

4.6.4 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

There are no draft environmental planning instruments applying to the site.

4.6.5 DEVELOPMENT CONTROL PLANS

The Cabonne Development Control Plans do not contain any controls relevant to the site or type of development proposed.

4.6.6 DEVELOPMENT CONTRIBUTIONS

MSM Milling have entered into negotiates in regard to establishing a voluntary planning agreement (VPA) in regard to the proposed development of the subject site. This is specifically in relation to the proposed development that is addressed in this application, and the currently lodged DA 2024/090. The proposed VPA proposes that a series of lump sum payments be made to Council, as well as the establishment of a community fund which will also receive a series of lump sum payments. These lump sum payments would be paid over a seven year period from the issue of an occupation certificate.

With consideration of this matter, it is requested that development contributions are not imposed on the basis that a VPA is to be established.

5. IMPACTS, SITE SUITABILITY & THE PUBLIC INTEREST

Pursuant to clause 24 of the EP&A Regulation, this section of the report outlines the environmental impacts of the proposed development and any measures required to protect the environment or lessen the harm to the environment.

The impacts have been identified through an assessment of the proposed development against the provisions of Section 4.15(1)(b) of the EP&A Act and the *Application Requirements* (Department of Planning and Environment 2022).

This section also addresses the consideration at Section 4.15(c) and Section 4.15(e) of the Act that relate to the suitability of the site for the development and the public interest.

5.1 Context and Setting

The proposed development involves the addition of a hexane solvent extraction plant in the vicinity of the existing facilities. While the structure will likely be visible from parts of the Manildra urban area, it is considered that the additions will appear fitting in the context of the surrounding agricultural/industrial buildings and uses, including the existing facilities of the site, as well as the nearby Manildra Flour Mill. The proposed works are in keeping with the existing industrial nature of the locality and as such are not expected to significantly impact on the local area.

The upgrade of the facility provides for the improved and ongoing viability of the development, which is noted to be an employment generator in the town of Manildra. The proposed development is therefore considered to positively contribute to the surrounding context of Manildra and continue to support the economic development of the township.

5.2 Access, Transport and Traffic

5.2.1 CONSTRUCTION PERIOD

The proposed development will result in increased traffic during the construction phase associated with construction staff coming to and from the site in light vehicles, construction materials and equipment being delivered to and taken from the site in heavy vehicles, and waste being taken away from the site in heavy vehicles. However, these impacts are expected to be short-lived and manageable through construction in accordance with a construction management plan, to be provided following DA approval.

5.2.2 OPERATION

Once operational, the additions are expected to improve efficiency and increase processing capacity on site, which is anticipated to result in an increase in output from the site. As discussed in the TIA of **Appendix B**, the proposed operations will result in minimal overall traffic impacts to the surrounding road network.

5.2.2.1 Traffic Generation

The TIA finds that the proposed canola mill upgrade would result in a percentage increase in traffic volumes on the surrounding road network ranging from 3% (Annual Average Daily Traffic volume (AADT) on Kiewa Street) to 62% (PM peak hour on Dederang Street). While the percentage increase on Dederang Street and Boree Street may seem significant, this is a reflection of the existing low traffic numbers on these streets, therefore is not expected to significantly impact on traffic generation or vehicle movements. The proposed increase remains within the operating capacity of the road. The TIA concludes that the net increase of daily traffic volume and peak hour volume generated by the development would be easily absorbed into the surrounding road network with minimal impact on the capacity of existing traffic streams.

5.2.2.2 Access

The existing access is to remain unchanged at the eastern end of Dederang Street, however as dealt with in the previous development application, heavy vehicles will now exit the site through the new access point further west on Dederang Street. The new access point enables vehicles to pass through the site in a forward direction at all times, including forward ingress and egress from the site.

The majority of heavy vehicles exiting the site will turn right and travel along Derowie Street and Carlisle Street to turn onto Boree Street, whereas light vehicles will turn left and travel along Dederang Street directly to Boree Street. The TIA finds that the existing sight distances at the relevant intersections are sufficient and that no changes are required to intersections or surrounding land.

5.2.2.3 Parking

The mill has a maximum workforce of up to 40 people on site at any one time, with 80% of workers travelling in their own private vehicles and 20% carpooling with two people in the car. Additionally, 4 spaces are required to be allocated for visitor parking. On this basis, 40 parking spaces are required to service the development.

The TIA concludes that there is sufficient parking available on and around the site to accommodate the site workforce demand.

5.3 Servicing

As discussed in the LEP assessment above, the site has sufficient access to services to address the demands of the canola mill upgrade or has the potential for extension or expansion of services to the site.

5.4 Other Land Resources

The proposed development occurs within largely undeveloped land except for the existing two dwellings and associated outbuildings, noting that it is currently zoned for industrial purposes. An application has been approved by Council for the demolition of these buildings to allow for further expansion of the existing MSM Milling agricultural processing industry. As such, the proposed development will not result in any impact on other land resources. The land is not agricultural land and is not impacted by a mining or exploration licences.

5.5 Air and Microclimate

The proposed development involves the expansion of existing operations of the mill, therefore an Air Quality Impact Assessment (AQIA) (**Appendix E**) has been completed to mitigate potential odour or air impacts on the surrounding environment. The AQIA recommends a new odour control system (OCS), in addition to the existing OCS, specifically related to the SEP. The proposed OCS will be based on chemical scrubbing and biofiltration technology. This will involve the installation of a new process air humidifier / scrubber unit to be installed in the SEP building, and a new biofiltration system on site comprising a two-cell, single-sided configuration with a bed area of approximately 244m² and a total wall height of 2.4m.

The assessment provided concludes that the operations of the proposed SEP in conjunction with the proposed OCS will present a low risk of causing an adverse odour and air quality impact on receptors within the surrounding environment.

5.6 Flora and Fauna

The proposed development occurs within predominantly cleared areas of land currently occupied by two dwellings and their ancillary outbuildings. While there is some scattered vegetation across the site, it is noted that recently determined DA 2024/0049 gave consent for the removal of all vegetation from the site. Further consideration of impacts associated with vegetation clearing is therefore not required.

5.7 Heritage

The site is not identified as being or adjoining a Heritage Item, nor is it within a Heritage Conservation Area under clause 5.10 of the LEP. While there are several heritage items within Manildra, the proposed development is not anticipated to adversely impact on the heritage significance, as the site is well distanced from these items and visually separated.

The due diligence process outlined in *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* outlines the process for determining whether detailed aboriginal heritage conservation considerations are necessary or not. While it is noted that there are recorded sites of Aboriginal significance within the surrounding area, an extensive AHIMS search confirmed that the nearest known sites are well separated from the subject site. It is considered that the site is within disturbed context and that the proposed development is unlikely to have a detrimental impact on any Aboriginal object or Aboriginal place of heritage significance.

5.8 Waste

During the construction phase, the proposed development would result in waste predominantly associated with packaging material. Packaging and any other waste generated during the construction phase is to be transported to an appropriate waste facility as designated by CSC.

Once operational, the proposed development is not expected to generate significant waste impacts, as the canola processing on site makes use of all resulting materials, either as canola oil, or canola meal or stock feed. Any waste that is generated is to be suitably managed in accordance with existing waste management processes. A waste management plan would be provided prior to commencement of construction.

5.9 Noise & Vibration

During the construction phase, the proposed development would result in noise impacts, however a noise impact assessment (NIA) found that these would be within the limits of EPL 13228 as issued by the NSW EPA. Several mitigation measures shall be imposed in accordance with the recommendations of the NIA, associated with heavy vehicles delivering materials to site and operation of construction equipment. However, the NIA also reviewed vibration impacts and found that no impacts were predicted. It is considered that the noise impact during construction will be minor and capable of being managed over the short-term construction period in accordance with recommendations of the acoustic assessment report provided.

Once operational, the proposed development is not expected to result in a significant change to existing levels of noise and vibration impacts. Noise level predictions indicate that mitigation measures will result in a noise level increase of no more than 1 dB, in comparison to the existing noise levels. Several mitigation measures have been recommended in the noise impact assessment (**Appendix F**) to ensure that noise level changes remain negligible. These include:

- Relocation of the hammer mill within the meal grinding building, along with specific construction requirements (external metal cladding, steel frame, acoustic insulation, internal acoustic lining panels) for first floor walls.
- Acoustic enclosure of the vacuum stripper gearbox and meal cooling fan within the SEP ground floor
- Compressors to the north of the boiler are to be installed within an acoustic enclosure, or an acoustic barrier installed to the north.
- Regular servicing of existing conveyors and replacement of any faulty rollers or bearings to reduce rattling noises.
- 3.5 metre high by 9.5 metre long acoustic barrier to suitably screen the chiller from surrounding receptors.

5.10 Natural Hazards

While there is a minimal amount of land that is mapped within the bushfire prone land mapping, it is noted that the mapped area is located in the far corner of Lot 242 DP750155, approximately 200m from the proposed structures for the site. Further, the recent DA for boundary realignment will ensure that the proposed development is located on a separate lot to the bushfire prone land. With consideration of these matters, it is unlikely that the bushfire mapping will adversely impact on the development.

5.11 Technological Hazards

There are no known technological hazards, such as contamination, affecting the site.

A PHA has been prepared by GHD for the project to address requirements around storage of dangerous good and associated levels of risk. The PHA concludes that while consequences of the considered scenarios can extend beyond the site boundary, MSM Milling can effectively manage the frequency and risk with the recommendations of the report to an acceptable level of risk. The recommendations of the report include:

- Review impact of consequence contours on existing MSM Milling plant equipment and determine how to reduce any adverse consequences if required (Consequence: Fire and explosion consequence)
- Ensure safe shutdown systems are tested in accordance with manufacturers specifications (Consequence: Fire and explosion consequence)
- That MSM Milling update their existing Site Emergency Plan to include the new development, and ensure that consequence results for the various scenarios are considered during emergency response planning, including location of emergency muster points and shelter-in-place advice (Consequence: All consequences)

Based on the conclusions and recommendations of the PHA it is considered that the development can effectively manage the frequency and risk of technological hazards on site and associated with the development.

5.12 Safety, Security and Crime Prevention

The guidelines prepared by the NSW Department of Urban Affairs and Planning (DUAP 2001) identify four (4) *Crime Prevention Through Environmental Design* (CPTED) principles to be considered in a Development Application to ensure developments do not create or exacerbate crime risk. The four key principles of the guidelines include surveillance, access control, territorial reinforcement, and space management.

5.13 Social Impact

As defined by the NSW Government Office on Social Policy, social impacts are significant events experienced by people as changes in one or more of the following are experienced:

- peoples' way of life (how they live, work or play and interact with one another on a day-to-day basis);
- their culture (shared beliefs, customs and values); or
- their community (its cohesion, stability, character, services and facilities).

The proposed development would not result in adverse impacts on any of these factors.

5.14 Economic Impact

It is anticipated that the proposed development will consolidate the operational capacity of the approved agricultural processing industry via enhancing the operational efficiency of the development. This in turn ensure the ongoing viability of the business for the benefit of employees and the local community.

5.15 Site Design and Internal Design

The proposed development is conceived to facilitate the efficient use of the site and augments and assists in the growth of an existing business in Manildra.

5.16 Construction Impacts

Construction impacts would be short-lived and manageable. The following standard construction management measures would be implemented to ensure impacts to the locality are minimised:

- Standard construction hours (7 am to 6 pm Monday to Friday and 8 am to 1 pm Saturday and at no times on Public holidays) would be implemented;
- Avoiding dust generating activities during windy and dry conditions; and
- Maintaining all equipment in good working condition such that the construction contractor and site manager ensure the prevention of the release of smoke by construction equipment, which would be in contravention of Section 124 of the *Protection of the Environment Operations Act 1997* and Clause 21 of the *Protection of the Environment Operations (Clean Air) Regulation 2022*.

In addition, the TIA notes that the expected traffic levels during construction are expected to be less than the expected maximum traffic volume during the operational phase. However, the TIA recommends that a Construction Traffic Management Plan (CTMP) be prepared by the appointed contractor prior to works commencing. The TIA states that the CTMP should provide specific information on construction associated traffic volumes and their distribution on the existing road network, and should include the following details:

- Vehicle volumes;
- Generation of traffic;
- Outline proposed routes for vehicles travelling to and from the site;
- Outline sufficient waiting areas off Kiewa Street and Boree Street to ensure any heavy vehicles waiting to access the site do not interfere with existing traffic;
- Ensure all vehicles enter and exit Dederang Street in a forward direction;
- Ensure loading and unloading of materials occurs on onsite;
- Outline suitable methodologies to manage traffic flows;
- Outline necessary inductions for site personnel;
- Outline suitable processes to manage complaints arising from construction works;
- Highlight any modifications to proposed vehicle routes for poor weather; and
- Ensure the noise reduction recommendations identified in the NIA are incorporated into the CTMP.

The NIA also discusses the following mitigation controls which could be utilised during the construction in relation to noise generation:

- Limiting the type and scale of concurrent activities undertaken close to sensitive receptors where possible;
- Using broadband reversing alarms on all mobile plant and equipment;
- Examine difference types of machines that perform the same function and compare the noise level data to select the least noisy machine;
- Operating plant in a quiet and efficient manner;
- Reduce throttle setting and turn off equipment when not being used;
- Regularly inspect and maintain equipment to ensure it is in good working order including checking the condition of mufflers; and
- Conduct community consultation to discuss the timing of works and potential respite periods.

The NIA also recommends that during any work generating high noise levels that have impulsive intermittent, low frequency or tonal characteristics, consultation with sensitive receptors occurs regularly.

5.17 Cumulative Impacts

It is not anticipated that the development would result in any cumulative impacts including:

- individual impacts so close in time that the effects of one are not dissipated before the next (time crowded effects);
- individual impacts so close in space that the effects overlap (space crowded effects);
- repetitive, often minor impacts eroding environmental conditions (nibbling effects); or
- different types of disturbances interacting to produce an effect which is greater or different than the sum of the separate effects (synergistic effects).

5.18 The Public Interest

The proposal is unlikely to be of concern to the public and is therefore not considered to be within the public interest given the opportunity for the development to generate employment in the local area, and the localised nature of any impacts.

Extensive pre-lodgement community consultation has been completed by MSM Milling, including letter drops, website information, community sessions and informal discussions with residents of Manildra and surrounding districts. General feedback as a result of this exercise has been very positive.

6. CONCLUSION

6.1 Suitability of the site

As demonstrated throughout **Section 5** of this report, the proposed development does not result in any adverse impacts for future users of the subject site, adjacent properties, or the locality. In this regard, the development is considered to fit into the locality, the site attributes are considered to be conducive to the development, and as such the development is suitable for the site.

6.2 Conclusion

The development the subject of this application involves the construction of a new solvent extraction plant and a number of other elements, including a new biofilter system, chiller plant, meal grinding and mixing building, a process water cooling system, and hexane storage tanks, in relation to the approved MSM Milling agricultural processing industry.

The proposed development is permissible with consent in the E5 – Heavy Industry under the Cabonne LEP, is not antipathetic to the zone objectives and is consistent with the development standards of the LEP. The development is unlikely to have any adverse environmental, social or economic impacts on the locality.

In this regard, the subject site is considered to be suitable for the proposed development.

7. REFERENCES

Table 6 – References

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APPENDIX A

PROJECT DRAWINGS

APPENDIX B

TRAFFIC IMPACT ASSESSMENT

APPENDIX C

JSRS ADVICE LETTER

Use of the Liquid Food Waste Order and Exemption of managing liquid wastes from an expanded MSM Milling facility

APPENDIX D

PRELIMINARY HAZARD ANALYSIS

APPENDIX E

AIR QUALITY IMPACT ASSESSMENT

APPENDIX F

NOISE IMPACT ASSESSMENT

APPENDIX G

SCHEMATIC VIEW OF A COOLING UNIT